

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IN RE PLATINUM BEECHWOOD LITIGATION,

No. 1:18-cv-06658-JSR

PROTECTIVE ORDER

-----X  
SENIOR HEALTH INSURANCE COMPANY OF  
PENNSYLVANIA,

No. 1:18-cv-06658-JSR

Plaintiff,

-v-

BEECHWOOD RE LTD., et al.,

Defendants.

-----X  
MARTIN TROTT and CHRISTOPHER SMITH, as  
Joint Official Liquidators and Foreign Representatives  
of PLATINUM PARTNERS VALUE ARBITRAGE  
FUND L.P. (in Official Liquidation) and PLATINUM  
PARTNERS VALUE ARBITRAGE FUND L.P.  
(in Official Liquidation),

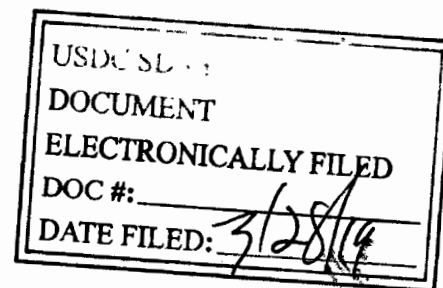
No. 1:18-cv-10936-JSR

Plaintiffs,

-v-

PLATINUM MANAGEMENT (NY) LLC, et al.,

Defendants.



-----X  
MELANIE L. CYGANOWSKI, as Equity Receiver for  
PLATINUM PARTNERS CREDIT OPPORTUNITIES  
MASTER FUND LP, PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND (TE) LLC, PLATINUM  
PARTNERS CREDIT OPPORTUNITIES FUND LLC,  
PLATINUM PARTNERS CREDIT OPPORTUNITIES  
FUND INTERNATIONAL LTD., PLATINUM  
PARTNERS CREDIT OPPORTUNITIES FUND  
INTERNATIONAL (A) LTD., and PLATINUM

No. 1:18-cv-12018-JSR

PARTNERS CREDIT OPPORTUNITIES FUND (BL)	:
LLC,	:
	:
Plaintiff,	:
	:
v.	:
	:
BEECHWOOD RE LTD., et al.,	:
	:
Defendants.	:
	:
	:
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**JED S. RAKOFF, U.S.D.J.**

The parties having agreed to the following terms of confidentiality, and the Court having found that good cause exists for issuance of an appropriately-tailored confidentiality order governing the pre-trial phase of the above-captioned actions captioned *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd.*, No. 1:18-cv-06658-JSR (the “SHIP Action”), *Trott v. Platinum Management (NY), LLC*, No. 1:18-cv-10936-JSR, and *Cyganowski, as Equity Receiver v. Beechwood Re Ltd.*, No. 1:18-cv-12018-JSR (collectively, the “Actions”), it is therefore hereby

ORDERED that any person subject to this Order -- including without limitation the parties to the Actions, their representatives, agents, experts and consultants, all third parties providing discovery in the Actions, and all other interested persons with actual or constructive notice of this Order -- shall adhere to the following terms, upon pain of contempt:

1. Any person subject to this Order who receives from any other person any “Discovery Material” (*i.e.*, information of any kind provided in the course of discovery in the Actions) that is designated as “Confidential” pursuant to the terms of this Order shall not disclose such Confidential Discovery Material to anyone else except as expressly permitted hereunder.

2. The person producing any given Discovery Material may designate as Confidential only such portion of such material as consists of:

(a) previously nondisclosed financial information (including without limitation profitability reports or estimates, percentage fees, design fees, royalty rates, minimum guarantee payments, sales reports and sale margins);

(b) previously nondisclosed material relating to ownership or control of any non-public company;

(c) previously nondisclosed business plans, product development information, marketing plans;

(d) any information of a personal or intimate nature regarding any individual; or

(e) material disclosed in an arbitration that is required to be treated as confidential under the rules, orders or agreements governing that arbitration, including, without limitation, "Arbitration Information," as that term is defined in the Confidentiality Agreement and Protective Order in the arbitration entitled *Bankers Consec Life Insurance Company et ano. v. Beechwood Re Ltd, et al.*, AAA Case No. 01-16-0004-2510;

(f) material filed under seal with any court; or

(g) any other category of information hereinafter given confidential status by the Court.

(h) For purposes of this paragraph "2," the phrase "previously nondisclosed" shall include, without limitation: (i) any disclosure of documents or information to a governmental agency or entity (but not including documents filed publicly), (ii) any disclosure pursuant to a discovery request or subpoena, (iii) material disclosed in an arbitration that is required to be treated as confidential under the rules, orders or agreements governing that arbitration, (iv) any disclosure under seal, and (v) any disclosure pursuant to a confidentiality agreement,

confidentiality order or nondisclosure agreement.

3. With respect to the Confidential portion of any Discovery Material other than deposition transcripts and exhibits, the producing person or that person's counsel may designate such portion as "Confidential" by stamping or otherwise clearly marking as "Confidential" the protected portion in a manner that will not interfere with legibility or audibility, and by also producing for future public use another copy of said Discovery Material with the confidential information redacted. With respect to deposition transcripts and exhibits, a producing person or that person's counsel may indicate on the record that a question calls for Confidential information, in which case the transcript of the designated testimony shall be bound in a separate volume and marked "Confidential Information Governed by Protective Order" by the reporter.

4. If at any time prior to the trial of the Actions, a producing person realizes that some portion[s] of Discovery Material that that person previously produced without limitation should be designated as Confidential, he may so designate by so apprising all parties in writing, and such designated portion[s] of the Discovery Material will thereafter be treated as Confidential under the terms of this Order.

5. No person subject to this Order other than the producing person shall disclose any of the Discovery Material designated by the producing person as Confidential to any other person whomsoever, except to:

- (a) the parties to the Actions;
- (b) counsel retained specifically for the Actions, including any paralegal, clerical and other assistant employed by such counsel and assigned to this matter;
- (c) as to any document, its author, its addressee, and any other person indicated on the face of the document as having received a copy;

(d) any witness who counsel for a party in good faith believes may be called to testify at trial or deposition in the Actions, provided such person has first executed a Non-Disclosure Agreement in the form annexed as an Exhibit hereto;

(e) any person retained by a party to serve as an expert witness or otherwise provide specialized advice to counsel in connection with the Actions, provided such person has first executed a Non-Disclosure Agreement in the form annexed as an Exhibit hereto;

(f) stenographers engaged to transcribe depositions conducted in the Actions; and

(g) the Court and its support personnel.

6. Prior to any disclosure of any Confidential Discovery Material to any person referred to in subparagraphs 5(d) or 5(e) above, such person shall be provided by counsel with a copy of this Order and shall sign a Non-Disclosure Agreement in the form annexed as an Exhibit hereto stating that that person has read this Order and agrees to be bound by its terms. Said counsel shall retain each signed Non-Disclosure Agreement, hold it in escrow, and produce it to opposing counsel either prior to such person being permitted to testify (at deposition or trial) or at the conclusion of the case, whichever comes first.

7. All Confidential Discovery Material filed with the Court, and all portions of pleadings, motions or other papers filed with the Court that disclose such Confidential Discovery Material, shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. The parties will use their best efforts to minimize such sealing. In any event, any party filing a motion or any other papers with the Court under seal shall also publicly file a redacted copy of the same, via the Court's Electronic Case Filing system, that redacts only the Confidential Discovery Material itself, and not text that in no material way reveals the Confidential Discovery Material.



8. Any party who either objects to any designation of confidentiality, or who, by contrast, requests still further limits on disclosure (such as “attorneys’ eyes only” in extraordinary circumstances), may at any time prior to the trial of the Actions serve upon counsel for the designating person a written notice stating with particularity the grounds of the objection or request. If agreement cannot be reached promptly, counsel for all affected persons will convene a joint telephone call with the Court to obtain a ruling.

9. All persons are hereby placed on notice that the Court is unlikely to seal or otherwise afford confidential treatment to any Discovery Material introduced in evidence at trial, even if such material has previously been sealed or designated as Confidential. The Court also retains unfettered discretion whether or not to afford confidential treatment to any Confidential Document or information contained in any Confidential Document submitted to the Court in connection with any motion, application, or proceeding that may result in an order and/or decision by the Court.

10. Each person who has access to Discovery Material that has been designated as Confidential shall take all due precautions to prevent the unauthorized or inadvertent disclosure of such material.

11. If, in connection with the Actions, a party inadvertently discloses information subject to a claim of attorney-client privilege or attorney work product protection (“Inadvertently Disclosed Information”), such disclosure shall not constitute or be deemed a waiver or forfeiture of any claim of privilege or work product protection with respect to the Inadvertently Disclosed Information and its subject matter.

12. If a disclosing party makes a claim of inadvertent disclosure, the receiving party shall, within five business days, return or destroy all copies of the Inadvertently Disclosed Information, and provide a certification of counsel that all such information has been returned or

destroyed. Nothing in paragraphs 11 or 12, or any other provision, of this Order is intended to, or shall limit, the scope or effect of any Order entered pursuant to Rule 502(d) of the Federal Rules of Evidence in the Actions.

13. Within five business days of the notification that such Inadvertently Disclosed Information has been returned or destroyed, the disclosing party shall produce a privilege log with respect to the Inadvertently Disclosed Information.

14. The receiving party may move the Court for an Order compelling production of the Inadvertently Disclosed Information. The motion shall be filed under seal, and shall not assert as a ground for entering such an Order the fact or circumstances of the inadvertent production.

15. The disclosing party retains the burden of establishing the privileged or protected nature of any Inadvertently Disclosed Information. Nothing in this Order shall limit the right of any party to request an *in camera* review of the Inadvertently Disclosed Information.

16. This Order shall survive the termination of the litigation. Within 30 days of the final disposition of the Actions, all Discovery Material designated as "Confidential," and all copies thereof, shall upon request be promptly returned to the producing person, or, upon permission of the producing person, destroyed to the extent reasonably possible taking into account backup systems and retention protocols.

17. This Order supersedes the Protective Order entered in the SHIP Action. (Dkt. No. 67)

18. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

SO STIPULATED AND AGREED.

**OTTERBOURG P.C.**

By: 

Adam C. Silverstein

Erik B. Weinick

Andrew S. Halpern

230 Park Avenue

New York, New York 10169

Telephone: (212) 661-9100

E-mail: [asilverstein@otterbourg.com](mailto:asilverstein@otterbourg.com)

[eweinick@otterbourg.com](mailto:eweinick@otterbourg.com)

[ahalpern@otterbourg.com](mailto:ahalpern@otterbourg.com)

*Attorneys for Melanie L. Cyganowski, as  
Receiver for Platinum Partners Credit  
Opportunities Master Fund LP, Platinum  
Partners Credit Opportunities Fund (TE) LLC,  
Platinum Partners Credit Opportunities Fund  
LLC, Platinum Partners Credit Opportunities  
Fund International Ltd., Platinum Partners  
Credit Opportunities Fund International (A)  
Ltd., Platinum Partners Credit Opportunities  
Fund (BL) LLC*

**LIPSIUS BENHAIM LAW LLP**

By: \_\_\_\_\_

Ira Lipsius

80-02 Kew Gardens Rd., Suite 1030

Kew Gardens, NY 11415

Telephone: (212) 981-8442

Email: [ilipsius@lipsiuslaw.com](mailto:ilipsius@lipsiuslaw.com)

*Attorneys for Beechwood Re Ltd., Beechwood  
Re Investments, LLC, B Asset Manager LP, B  
Asset Manager II LP, Beechwood Re Holdings,  
Inc., Beechwood Bermuda International LTD.,  
Beechwood Bermuda LTD., BAM  
Administrative Services LLC, Moshe M. Feuer,  
Feuer Family 2016ACQ Trust, Taylor-Lau  
Family 2016ACQ Trust, Scott A. Taylor,  
Dhruv Narain, Beechwood Capital Group  
LLC, Beechwood Re Investments, LLC,  
Beechwood Re Holdings, Inc., BBLN-PEDCO  
Corp., Illumin Capital Management LP,  
BHLN-PEDCO Corp.*



**OTTERBOURG P.C.**

By: \_\_\_\_\_

Adam C. Silverstein  
Erik B. Weinick  
Andrew S. Halpern  
230 Park Avenue  
New York, New York 10169  
Telephone: (212) 661-9100  
E-mail: [asilverstein@otterbourg.com](mailto:asilverstein@otterbourg.com)  
[eweinick@otterbourg.com](mailto:eweinick@otterbourg.com)  
[ahalpern@otterbourg.com](mailto:ahalpern@otterbourg.com)

*Attorneys for Melanie L. Cyganowski, as  
Receiver for Platinum Partners Credit  
Opportunities Master Fund LP, Platinum  
Partners Credit Opportunities Fund (TE) LLC,  
Platinum Partners Credit Opportunities Fund  
LLC, Platinum Partners Credit Opportunities  
Fund International Ltd., Platinum Partners  
Credit Opportunities Fund International (A)  
Ltd., Platinum Partners Credit Opportunities  
Fund (BL) LLC*

**LIPSIUS BENHAIM LAW LLP**

By: \_\_\_\_\_

Ira Lipsius  
80-02 Kew Gardens Rd., Suite 1030  
Kew Gardens, NY 11415  
Telephone: (212) 981-8442  
Email: [ilipsius@lipsiuslaw.com](mailto:ilipsius@lipsiuslaw.com)

*Attorneys for Beechwood Re Ltd., Beechwood  
Re Investments, LLC, B Asset Manager LP, B  
Asset Manager II LP, Beechwood Re Holdings,  
Inc., Beechwood Bermuda International LTD.,  
Beechwood Bermuda LTD., BAM  
Administrative Services LLC, Moshe M. Feuer,  
Feuer Family 2016ACQ Trust, Taylor-Lau  
Family 2016ACQ Trust, Scott A. Taylor,  
Dhruv Narain, Beechwood Capital Group  
LLC, Beechwood Re Investments, LLC,  
Beechwood Re Holdings, Inc., BBLN-PEDCO  
Corp., Illumin Capital Management LP,  
BHLN-PEDCO Corp.*

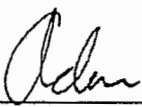
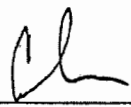
[SIGNATURES CONTINUE FROM PRECEDING PAGE]

KATTEN MUCHIN ROSENMAN LLP

By: \_\_\_\_\_  
Anthony Paccione  
575 Madison Avenue  
New York, NY 10022  
Telephone: (212) 940-8502  
Email: [Anthony.paccione@kattenlaw.com](mailto:Anthony.paccione@kattenlaw.com)

*Attorneys for Olive Tree Capital LLC*

WALDEN MACHT & HARAN LLP

By:   \_\_\_\_\_  
Sean T. Haran  
Adam P. Cohen  
Jeffrey L. Ding  
1 Battery Park Plaza  
New York, NY 10004  
Telephone: (212) 335-2030  
Email: [acohen@wmhlaw.com](mailto:acohen@wmhlaw.com)  
[jding@wmhlaw.com](mailto:jding@wmhlaw.com)  
[sharan@wmhlaw.com](mailto:sharan@wmhlaw.com)

*Attorneys for Naftali Manela*

DLA PIPER LLP (US)

By: \_\_\_\_\_  
Aidan M. McCormack  
R. Brian Seibert  
Mark L. Deckman  
1251 Avenue of the Americas, 27th Floor  
New York, New York 10020  
Telephone: (212) 335-4500  
E-mail: [aidan.mccormack@dlapiper.com](mailto:aidan.mccormack@dlapiper.com)  
[brian.seibert@dlapiper.com](mailto:brian.seibert@dlapiper.com)  
[mark.deckman@dlapiper.com](mailto:mark.deckman@dlapiper.com)

*Attorneys for Plaintiffs and Defendants  
Senior Health Insurance Company of  
Pennsylvania and Fuzion Analytics, Inc.*

ALSTON & BIRD LLP

By: \_\_\_\_\_  
John M. Aerni  
Adam J. Kaiser  
Daniella P. Main  
Jenna Chelsea Polivy  
90 Park Avenue  
New York, NY 10016  
Telephone: (212) 210-9400  
Email: [adam.kaiser@alston.com](mailto:adam.kaiser@alston.com)  
[john.aerni@alston.com](mailto:john.aerni@alston.com)  
[daniella.main@alston.com](mailto:daniella.main@alston.com)

*Attorneys for Defendants Bankers Consecro  
Life Insurance Company, Washington National  
Insurance Company, CNO Financial Group,  
Inc. and 40/86 Advisors, Inc.*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**KATTEN MUCHIN ROSENMAN LLP**

By: \_\_\_\_\_  
Anthony Paccione  
575 Madison Avenue  
New York, NY 10022  
Telephone: (212) 940-8502  
Email: [Anthony.paccione@kattenlaw.com](mailto:Anthony.paccione@kattenlaw.com)

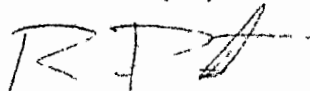
*Attorneys for Olive Tree Capital LLC*

**WALDEN MACHT & HARAN LLP**

By: \_\_\_\_\_  
Adam P. Cohen  
Jeffrey L. Ding  
Sean T. Haran  
1 Battery Park Plaza  
New York, NY 10004  
Telephone: (212) 335-2000  
Email: [acohen@wmhlaw.com](mailto:acohen@wmhlaw.com)  
[jding@wmhlaw.com](mailto:jding@wmhlaw.com)  
[sharan@wmhlaw.com](mailto:sharan@wmhlaw.com)

*Attorneys for Naftali Manela*

**DLA PIPER LLP (US)**

By:  \_\_\_\_\_  
Aidan M. McCormack  
Mark L. Deckman  
R. Brian Seibert  
1251 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 335-4500  
E-mail: [aidan.mccormack@dlapiper.com](mailto:aidan.mccormack@dlapiper.com)  
[brian.seibert@dlapiper.com](mailto:brian.seibert@dlapiper.com)  
[mark.deckman@dlapiper.com](mailto:mark.deckman@dlapiper.com)

-and-

James D. Mathias (*pro hac vice*)  
Kathleen A. Birrane (*pro hac vice*)  
Ellen E. Dew (*pro hac vice*)  
6225 Smith Avenue  
Baltimore, Maryland 21209-3600  
Telephone: (410) 580-3000  
E-mail: [james.mathias@dlapiper.com](mailto:james.mathias@dlapiper.com)  
[kathleen.birrane@dlapiper.com](mailto:kathleen.birrane@dlapiper.com)  
[ellen.dew@dlapiper.com](mailto:ellen.dew@dlapiper.com)

*Attorneys for Senior Health Insurance  
Company of Pennsylvania and Fuzion  
Analytics, Inc.*

**ALSTON & BIRD LLP**

By: \_\_\_\_\_  
John M. Aerni  
Adam J. Kaiser  
Daniella P. Main  
Jenna Chelsea Polivy  
90 Park Avenue  
New York, NY 10016  
Telephone: (212) 210-9400  
Email: [adam.kaiser@alston.com](mailto:adam.kaiser@alston.com)  
[john.aerni@alston.com](mailto:john.aerni@alston.com)  
[daniella.main@alston.com](mailto:daniella.main@alston.com)

*Attorneys for Defendants Bankers Consecro  
Life Insurance Company, Washington National  
Insurance Company, CNO Financial Group,  
Inc. and 40/86 Advisors, Inc.*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**KATTEN MUCHIN ROSENMAN LLP**

By: \_\_\_\_\_  
Anthony Paccione  
575 Madison Avenue  
New York, NY 10022  
Telephone: (212) 940-8502  
Email: [Anthony.paccione@kattenlaw.com](mailto:Anthony.paccione@kattenlaw.com)

*Attorneys for Olive Tree Capital LLC*

**WALDEN MACHT & HARAN LLP**

By: \_\_\_\_\_  
Adam P. Cohen  
Jeffrey L. Ding  
Sean T. Haran  
1 Battery Park Plaza  
New York, NY 10004  
Telephone: (212) 335-2000  
Email: [acohen@wmhlaw.com](mailto:acohen@wmhlaw.com)  
[jding@wmhlaw.com](mailto:jding@wmhlaw.com)  
[sharan@wmhlaw.com](mailto:sharan@wmhlaw.com)

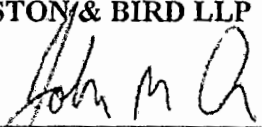
*Attorneys for Naftali Manela*

**DLA PIPER LLP (US)**

By: \_\_\_\_\_  
Aidan M. McCormack  
R. Brian Seibert  
Mark L. Deckman  
1251 Avenue of the Americas, 27th Floor  
New York, New York 10020  
Telephone: (212) 335-4500  
E-mail: [aidan.mccormack@dlapiper.com](mailto:aidan.mccormack@dlapiper.com)  
[brian.seibert@dlapiper.com](mailto:brian.seibert@dlapiper.com)  
[mark.deckman@dlapiper.com](mailto:mark.deckman@dlapiper.com)

*Attorneys for Plaintiffs and Defendants  
Senior Health Insurance Company of  
Pennsylvania and Fuzion Analytics, Inc.*

**ALSTON & BIRD LLP**

By:  \_\_\_\_\_  
John M. Aerni  
Adam J. Kaiser  
Daniella P. Main  
Jenna Chelsea Polivy  
90 Park Avenue  
New York, NY 10016  
Telephone: (212) 210-9400  
Email: [adam.kaiser@alston.com](mailto:adam.kaiser@alston.com)  
[john.aerni@alston.com](mailto:john.aerni@alston.com)  
[daniella.main@alston.com](mailto:daniella.main@alston.com)

*Attorneys for Defendants Bankers Consecro  
Life Insurance Company, Washington National  
Insurance Company, CNO Financial Group,  
Inc. and 40/86 Advisors, Inc.*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**PROSKAUER ROSE LLP**

By: 

Mark D. Harris  
Steven H. Holinstat  
Stacy P. Eilbaum  
Edward J. Canter

11 Times Square  
New York, NY 10036  
Telephone: (212) 969-3000  
Email: [mharris@proskauer.com](mailto:mharris@proskauer.com)  
[sholinstat@proskauer.com](mailto:sholinstat@proskauer.com)  
[seilbaum@proskauer.com](mailto:seilbaum@proskauer.com)  
[ecanter@proskauer.com](mailto:ecanter@proskauer.com)

*Attorneys for B Asset Manager, L.P.,  
Beechwood Bermuda International Ltd.,  
Beechwood Re Investments, LLC, Mark Feuer,  
Scott Taylor, and Dhruv Narain in the SHIP  
Action*

**HOLLAND & KNIGHT LLP**

By: \_\_\_\_\_

Warren E. Gluck, Esq.  
Barbra R. Parlin, Esq.  
John L. Brownlee, Esq.  
Belevetz, Esq.  
Richard A. Bixter Jr., Esq.

31 West 52<sup>nd</sup> Street  
New York, New York 10019  
Telephone: (212) 513-3200  
Email: [warren.gluck@hklaw.com](mailto:warren.gluck@hklaw.com)  
[barbra.parlin@hklaw.com](mailto:barbra.parlin@hklaw.com)  
[john.brownlee@hklaw.com](mailto:john.brownlee@hklaw.com)  
[timothy.belevetz@hklaw.com](mailto:timothy.belevetz@hklaw.com)  
[richard.bixter@hklaw.com](mailto:richard.bixter@hklaw.com)

*Attorneys for Plaintiffs Martin Trott and  
Christopher Smith, as Joint Official  
Liquidators and Foreign Representatives of  
Platinum Partners Value Arbitrage Fund L.P.  
(in Official Liquidation), and for Platinum  
Partners Value Arbitrage Fund L.P. (in  
Official Liquidation)*

**MOSKOWITZ & BOOK, LLP**

By: \_\_\_\_\_

Avraham C. Moskowitz  
345 Seventh Avenue, 21st Floor  
New York, NY 10001  
Telephone: (212) 221-7999  
Email: [amoskowitz@mb-llp.com](mailto:amoskowitz@mb-llp.com)

*Attorneys for Platinum F.I. Group, LLC*

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

By: \_\_\_\_\_

Daniel Tepper  
270 Madison Avenue  
New York, NY 10016  
Telephone: (212) 545-4600  
Email: [tepper@whafh.com](mailto:tepper@whafh.com)

*Attorneys for Leon Meyers*



[SIGNATURES CONTINUE FROM PRECEDING PAGE]

PROSKAUER ROSE LLP

By: \_\_\_\_\_

Edward J. Canter  
Mark D. Harris  
Stacy P. Eilbaum  
Steven H. Holinstat

11 Times Square  
New York, NY 10036  
Telephone: (212) 969-3106  
Email: [ecanter@proskauer.com](mailto:ecanter@proskauer.com)  
[mharris@proskauer.com](mailto:mharris@proskauer.com)  
[seilbaum@proskauer.com](mailto:seilbaum@proskauer.com)  
[sholinstat@proskauer.com](mailto:sholinstat@proskauer.com)

*Attorneys for B Asset Manager, Beechwood  
Bermuda International Ltd., Beechwood Re  
Investments, LLC, Moshe a/k/a Mark Feuer,  
Scott Taylor*

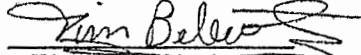
MOSKOWITZ & BOOK, LLP

By: \_\_\_\_\_

Avraham C. Moskowitz  
345 Seventh Avenue, 21st Floor  
New York, NY 10001  
Telephone: (212) 221-7999  
Email: [amoskowitz@mb-llp.com](mailto:amoskowitz@mb-llp.com)

*Attorneys for Platinum F.I. Group, LLC*

HOLLAND & KNIGHT LLP

By:  \_\_\_\_\_

Warren E. Gluck, Esq.  
Barbra R. Parlin, Esq.  
John L. Brownlee, Esq.  
Timothy D. Belevetz, Esq.  
Richard A. Bixter Jr., Esq.

31 West 52<sup>nd</sup> Street  
New York, New York 10019  
Telephone: (212) 513-3200  
Email: [warren.gluck@hklaw.com](mailto:warren.gluck@hklaw.com)  
[barbra.parlin@hklaw.com](mailto:barbra.parlin@hklaw.com)  
[john.brownlee@hklaw.com](mailto:john.brownlee@hklaw.com)  
[timothy.belevetz@hklaw.com](mailto:timothy.belevetz@hklaw.com)  
[richard.bixter@hklaw.com](mailto:richard.bixter@hklaw.com)

*Attorneys for Plaintiffs Martin Trott and  
Christopher Smith, as Joint Official  
Liquidators and Foreign Representatives of  
Platinum Partners Value Arbitrage Fund L.P.  
(in Official Liquidation), and for Platinum  
Partners Value Arbitrage Fund L.P. (in  
Official Liquidation)*

WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP

By: \_\_\_\_\_

Daniel Tepper  
270 Madison Avenue  
New York, NY 10016  
Telephone: (212) 545-4600  
Email: [tepper@whafh.com](mailto:tepper@whafh.com)

*Attorneys for Leon Meyers*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**PROSKAUER ROSE LLP**

By: \_\_\_\_\_

Edward J. Canter  
Mark D. Harris  
Stacy P. Eilbaum  
Steven H. Holinstat

11 Times Square  
New York, NY 10036  
Telephone: (212) 969-3106  
Email: [ecanter@proskauer.com](mailto:ecanter@proskauer.com)  
[mharris@proskauer.com](mailto:mharris@proskauer.com)  
[seilbaum@proskauer.com](mailto:seilbaum@proskauer.com)  
[sholinstat@proskauer.com](mailto:sholinstat@proskauer.com)

*Attorneys for B Asset Manager, Beechwood  
Bermuda International Ltd., Beechwood Re  
Investments, LLC, Moshe a/k/a Mark Feuer,  
Scott Taylor*

**HOLLAND & KNIGHT LLP**

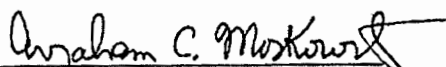
By: \_\_\_\_\_

Warren E. Gluck, Esq.  
Barbra R. Parlin, Esq.  
John L. Brownlee, Esq.  
Belevetz, Esq.  
Richard A. Bixter Jr., Esq.

31 West 52<sup>nd</sup> Street  
New York, New York 10019  
Telephone: (212) 513-3200  
Email: [warren.gluck@hklaw.com](mailto:warren.gluck@hklaw.com)  
[barbra.parlin@hklaw.com](mailto:barbra.parlin@hklaw.com)  
[john.brownlee@hklaw.com](mailto:john.brownlee@hklaw.com)  
[timothy.belevetz@hklaw.com](mailto:timothy.belevetz@hklaw.com)  
[richard.bixter@hklaw.com](mailto:richard.bixter@hklaw.com)

*Attorneys for Plaintiffs Martin Trott and  
Christopher Smith, as Joint Official  
Liquidators and Foreign Representatives of  
Platinum Partners Value Arbitrage Fund L.P.  
(in Official Liquidation), and for Platinum  
Partners Value Arbitrage Fund L.P. (in  
Official Liquidation)*

**MOSKOWITZ & BOOK, LLP**

By:  \_\_\_\_\_

Avraham C. Moskowitz  
345 Seventh Avenue, 21st Floor  
New York, NY 10001  
Telephone: (212) 221-7999  
Email: [amoskowitz@mb-llp.com](mailto:amoskowitz@mb-llp.com)

*Attorneys for Platinum F.I. Group, LLC  
And Abraham Grossman*

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

By: \_\_\_\_\_

Daniel Tepper  
270 Madison Avenue  
New York, NY 10016  
Telephone: (212) 545-4600  
Email: [tepper@whafh.com](mailto:tepper@whafh.com)

*Attorneys for Leon Meyers*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**PROSKAUER ROSE LLP**

By: \_\_\_\_\_  
Edward J. Canter  
Mark D. Harris  
Stacy P. Eilbaum  
Steven H. Holinstat  
11 Times Square  
New York, NY 10036  
Telephone: (212) 969-3106  
Email: [ecanter@proskauer.com](mailto:ecanter@proskauer.com)  
[mharris@proskauer.com](mailto:mharris@proskauer.com)  
[seilbaum@proskauer.com](mailto:seilbaum@proskauer.com)  
[sholinstat@proskauer.com](mailto:sholinstat@proskauer.com)

*Attorneys for B Asset Manager, Beechwood  
Bermuda International Ltd., Beechwood Re  
Investments, LLC, Moshe a/k/a Mark Feuer,  
Scott Taylor*

**HOLLAND & KNIGHT LLP**

By: \_\_\_\_\_  
Warren E. Gluck, Esq.  
Barbra R. Parlin, Esq.  
John L. Brownlee, Esq.  
Belevetz, Esq.  
Richard A. Bixter Jr., Esq.  
31 West 52<sup>nd</sup> Street  
New York, New York 10019  
Telephone: (212) 513-3200  
Email: [warren.gluck@hklaw.com](mailto:warren.gluck@hklaw.com)  
[barbra.parlin@hklaw.com](mailto:barbra.parlin@hklaw.com)  
[john.brownlee@hklaw.com](mailto:john.brownlee@hklaw.com)  
[timothy.belevetz@hklaw.com](mailto:timothy.belevetz@hklaw.com)  
[richard.bixter@hklaw.com](mailto:richard.bixter@hklaw.com)

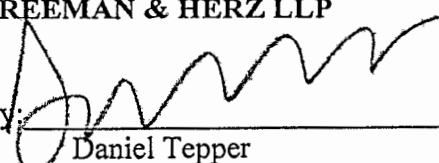
*Attorneys for Plaintiffs Martin Trott and  
Christopher Smith, as Joint Official  
Liquidators and Foreign Representatives of  
Platinum Partners Value Arbitrage Fund L.P.  
(in Official Liquidation), and for Platinum  
Partners Value Arbitrage Fund L.P. (in  
Official Liquidation)*

**MOSKOWITZ & BOOK, LLP**

By: \_\_\_\_\_  
Avraham C. Moskowitz  
345 Seventh Avenue, 21st Floor  
New York, NY 10001  
Telephone: (212) 221-7999  
Email: [amoskowitz@mb-llp.com](mailto:amoskowitz@mb-llp.com)

*Attorneys for Platinum F.I. Group, LLC*


**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

By:  \_\_\_\_\_  
Daniel Tepper  
270 Madison Avenue  
New York, NY 10016  
Telephone: (212) 545-4600  
Email: [tepper@whafh.com](mailto:tepper@whafh.com)

*Attorneys for Leon Meyers*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**ROYER COOPER COHEN BRAUNFELD     DAVID LEVY  
LLC**

By:   
Marc E. Hirschfield  
Marc F. Skapof  
Royer Cooper Cohen Braunfeld LLC  
1120 Avenue of the Americas  
Fourth Floor  
New York, NY 10036  
Telephone: (212) 994-0451  
Email: [MHirschfield@rccblaw.com](mailto:MHirschfield@rccblaw.com)  
[mskapof@rccblaw.com](mailto:mskapof@rccblaw.com)

Barry L. Cohen  
101 West Elm St., Suite 400  
Conshohocken, PA 19428  
Telephone: (484) 362-2628  
Email: [bcohen@rccblaw.com](mailto:bcohen@rccblaw.com)

*Attorneys for Twosons Corporation*

**LANGLER SIFFERT & WOHL LLP**

By: \_\_\_\_\_  
David Hodges  
Matthew Coogan  
500 Fifth Avenue, 34th Floor  
New York, NY 10110  
Telephone: (212) 921-8399  
Email: [dhodges@lswlaw.com](mailto:dhodges@lswlaw.com)  
[mcoogan@lswlaw.com](mailto:mcoogan@lswlaw.com)

*Attorneys for David Steinberg*

By: \_\_\_\_\_  
David Levy  
50 Riverside Boulevard  
Apr 24C  
New York, New York 10069

*Pro Se*

**CURTIS, MALLET-PREVOST, COLT &  
MOSLE LLP**

By: \_\_\_\_\_  
Eliot Lauer  
Gabriel Hertzberg  
Jacques Semmelman  
Julia Gumpfer  
101 Park Avenue  
New York, NY 10178  
Telephone: (212) 696-8856  
Email: [ghertzberg@curtis.com](mailto:ghertzberg@curtis.com)  
[elauer@curtis.com](mailto:elauer@curtis.com)  
[jsemmelman@curtis.com](mailto:jsemmelman@curtis.com)  
[jgumpfer@curtis.com](mailto:jgumpfer@curtis.com)

*Attorneys for David Bodner, Beechwood Trust  
Nos. 7-14*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

ROYER COOPER COHEN BRAUNFELD  
LLC

By: \_\_\_\_\_  
Marc E. Hirschfield  
Marc F. Skapof  
Royer Cooper Cohen Braunfeld LLC  
1120 Avenue of the Americas  
Fourth Floor  
New York, NY 10036  
Telephone: (212) 994-0451  
Email: [MHirschfield@rccblaw.com](mailto:MHirschfield@rccblaw.com)  
[mskapof@rccblaw.com](mailto:mskapof@rccblaw.com)

Barry L. Cohen  
101 West Elm St., Suite 400  
Conshohocken, PA 19428  
Telephone: (484) 362-2628  
Email: [bcohen@rccblaw.com](mailto:bcohen@rccblaw.com)

*Attorneys for Twosons Corporation*

LANGLER SIFFERT & WOHL LLP

By: \_\_\_\_\_  
David Hodges  
Matthew Coogan  
500 Fifth Avenue, 34th Floor  
New York, NY 10110  
Telephone: (212) 921-8399  
Email: [dhodges@lswlaw.com](mailto:dhodges@lswlaw.com)  
[mcoogan@lswlaw.com](mailto:mcoogan@lswlaw.com)

*Attorneys for David Steinberg*

DAVID LEVY

By: \_\_\_\_\_  
David Levy  
50 Riverside Boulevard  
Apr 24C  
New York, New York 10069

*Pro Se in the Trott Matter*

CURTIS, MALLET-PREVOST, COLT &  
MOSLE LLP

By: \_\_\_\_\_  
Eliot Lauer  
Gabriel Hertzberg  
Jacques Semmelman  
Julia Gumpper  
101 Park Avenue  
New York, NY 10178  
Telephone: (212) 696-8856  
Email: [ghertzberg@curtis.com](mailto:ghertzberg@curtis.com)  
[elauer@curtis.com](mailto:elauer@curtis.com)  
[jsemmelman@curtis.com](mailto:jsemmelman@curtis.com)  
[jgumpper@curtis.com](mailto:jgumpper@curtis.com)

*Attorneys for David Bodner, Beechwood Trust  
Nos. 7-14*



[SIGNATURES CONTINUE FROM PRECEDING PAGE]

ROYAL COOPER COHEN BRAUNFELD      DAVID LEVY  
LLC

By: \_\_\_\_\_  
Barry L. Cohen  
101 West Elm St., Suite 400  
Conshohocken, PA 19428  
Telephone: (484) 362-2628  
Email: [bcohen@rccblaw.com](mailto:bcohen@rccblaw.com)

Marc E. Hirschfield  
Marc F. Skapof  
Royer Cooper Cohen Braunfeld LLC  
1120 Avenue of the Americas  
Fourth Floor  
New York, NY 10036  
Telephone: (212) 994-0451  
Email: [MHirschfield@rccblaw.com](mailto:MHirschfield@rccblaw.com)  
[mskapof@rccblaw.com](mailto:mskapof@rccblaw.com)

*Attorneys for Twosons Corporation*

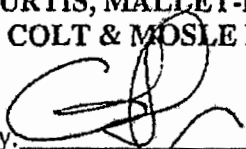
LANGLER SIFFERT & WOHL LLP

By: \_\_\_\_\_  
David Hodges  
Matthew Coogan  
500 Fifth Avenue, 34th Floor  
New York, NY 10110  
Telephone: (212) 921-8399  
Email: [dhodges@lswlaw.com](mailto:dhodges@lswlaw.com)  
[mcoogan@lswlaw.com](mailto:mcoogan@lswlaw.com)

*Attorneys for David Steinberg*

By: \_\_\_\_\_  
David Levy  
50 Riverside Boulevard  
Apr 24C  
New York, New York 10069  
  
*Pro Se*


CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP

By:  \_\_\_\_\_  
Eliot Lauer  
Jacques Semmelman  
Gabriel Hertzberg  
101 Park Avenue  
New York, NY 10178  
Telephone: (212) 696-8856  
Email: [elauer@curtis.com](mailto:elauer@curtis.com)  
[jsemmelman@curtis.com](mailto:jsemmelman@curtis.com)  
[ghertzberg@curtis.com](mailto:ghertzberg@curtis.com)

*Attorneys for David Bodner, Beechwood Trust  
Nos. 7-14*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**MORRISON COHEN LLP**

By:   
Donald Chase  
Daniel Isaacs  
909 Third Avenue  
New York, NY 10022  
Telephone: (212) 735-8653  
Email: [dchase@morrisoncohen.com](mailto:dchase@morrisoncohen.com)  
[disaacs@morrisoncohen.com](mailto:disaacs@morrisoncohen.com)

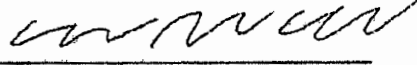
*Attorneys for Huberfeld Family Foundation*

**BINDER & SCHWARTZ LLP**

By: \_\_\_\_\_  
Wendy H. Schwartz  
Gregory C. Pruden  
366 Madison Avenue, 6th Floor  
New York, NY 10017  
Telephone: (212) 510-7008  
Email: [wschwartz@binderschwartz.com](mailto:wschwartz@binderschwartz.com)  
[gpruden@binderschwartz.com](mailto:gpruden@binderschwartz.com)

*Attorneys for Daniel Saks*

**PIERCE BAINBRIDGE BECK PRICE & HECHT LLP**

By:   
Eric M. Creizman  
747 Third Avenue, Suite 200  
New York, NY 10017  
Telephone: (212) 972-0200  
Email: [ecreizman@piercebainbridge.com](mailto:ecreizman@piercebainbridge.com)

*Attorneys for David Oltensoser*

**JEFFREY C. DANIELS PC**

By: \_\_\_\_\_  
Jeffrey C. Daniels  
4 Carren Circle  
Huntington, NY 11743  
Telephone: (516) 745-5430  
Email: [jdaniels@jcdpc.com](mailto:jdaniels@jcdpc.com)

*Attorneys for Murray Huberfeld*

**PERKINS COIE LLP**

By: \_\_\_\_\_  
John Penn  
Jeffrey Vanacore  
30 Rockefeller Plaza, 22nd Floor  
New York, New York 10112  
Telephone: (212) 262-6900  
Email: [jpenn@perkinscoie.com](mailto:jpenn@perkinscoie.com)  
[jvanacore@perkinscoie.com](mailto:jvanacore@perkinscoie.com)

*Attorneys for GRD Estates Ltd.*

**LAW OFFICES OF KENNETH A. ZITTER**

By: \_\_\_\_\_  
Kenneth A. Zitter  
260 Madison Avenue  
New York, NY 10016  
Telephone: (212) 532-8000  
Email: [kzitter@aol.com](mailto:kzitter@aol.com)

*Attorneys for Estate of Jules Nordlicht,  
Barbara Nordlicht, FCBA Trust, Aaron  
Parnes, Sarah Parnes, Shmuel Fuchs  
Foundation, Solomon Werdiger, Morris Fuchs*

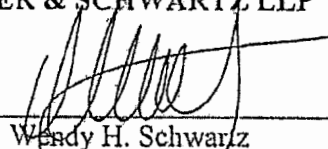
[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**MORRISON COHEN LLP**

By: \_\_\_\_\_  
Donald Chase  
Daniel Isaacs  
909 Third Avenue  
New York, NY 10022  
Telephone: (212) 735-8653  
Email: [dchase@morrisoncohen.com](mailto:dchase@morrisoncohen.com)  
[disaacs@morrisoncohen.com](mailto:disaacs@morrisoncohen.com)

*Attorneys for Huberfeld Family Foundation*

**BINDER & SCHWARTZ LLP**

By: \_\_\_\_\_  
  
Wendy H. Schwartz  
Gregory C. Pruden  
366 Madison Avenue, 6th Floor  
New York, NY 10017  
Telephone: (212) 510-7008  
Email: [wschwartz@binderschwartz.com](mailto:wschwartz@binderschwartz.com)  
[gpruden@binderschwartz.com](mailto:gpruden@binderschwartz.com)

*Attorneys for Daniel Saks*

**PIERCE BAINBRIDGE BECK PRICE & HECHT LLP**

By: \_\_\_\_\_  
Eric M. Creizman  
747 Third Avenue, Suite 200  
New York, NY 10017  
Telephone: (212) 972-0200  
Email: [ecreizman@piercebainbridge.com](mailto:ecreizman@piercebainbridge.com)

*Attorneys for David Ottensoser*

**JEFFREY C. DANIELS PC**

By: \_\_\_\_\_  
Jeffrey C. Daniels  
4 Carren Circle  
Huntington, NY 11743  
Telephone: (516) 745-5430  
Email: [jdaniels@jcdpc.com](mailto:jdaniels@jcdpc.com)

*Attorneys for Murray Huberfeld*

**PERKINS COIE LLP**

By: \_\_\_\_\_  
John Penn  
Jeffrey Vanacore  
30 Rockefeller Plaza, 22nd Floor  
New York, New York 10112  
Telephone: (212) 262-6900  
Email: [jpenn@perkinscoie.com](mailto:jpenn@perkinscoie.com)  
[jvanacore@perkinscoie.com](mailto:jvanacore@perkinscoie.com)

*Attorneys for GRD Estates Ltd.*

**LAW OFFICES OF KENNETH A. ZITTER**

By: \_\_\_\_\_  
Kenneth A. Zitter  
260 Madison Avenue  
New York, NY 10016  
Telephone: (212) 532-8000  
Email: [kzitter@aol.com](mailto:kzitter@aol.com)

*Attorneys for Estate of Jules Nordlicht,  
Barbara Nordlicht, FCBA Trust, Aaron  
Parnes, Sarah Parnes, Shmuel Fuchs  
Foundation, Solomon Werdiger, Morris Fuchs*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**MORRISON COHEN LLP**

By: \_\_\_\_\_  
Donald Chase  
Daniel Isaacs  
909 Third Avenue  
New York, NY 10022  
Telephone: (212) 735-8653  
Email: [dchase@morrisoncohen.com](mailto:dchase@morrisoncohen.com)  
[disaacs@morrisoncohen.com](mailto:disaacs@morrisoncohen.com)

*Attorneys for Huberfeld Family Foundation*

**BINDER & SCHWARTZ LLP**

By: \_\_\_\_\_  
Wendy H. Schwartz  
Gregory C. Pruden  
366 Madison Avenue, 6th Floor  
New York, NY 10017  
Telephone: (212) 510-7008  
Email: [wschwartz@binderschwartz.com](mailto:wschwartz@binderschwartz.com)  
[gpruden@binderschwartz.com](mailto:gpruden@binderschwartz.com)

*Attorneys for Daniel Saks*

**PIERCE BAINBRIDGE BECK PRICE &  
HECHT LLP**

By: \_\_\_\_\_  
Eric M. Creizman  
747 Third Avenue, Suite 200  
New York, NY 10017  
Telephone: (212) 972-0200  
Email: [ecreizman@piercebainbridge.com](mailto:ecreizman@piercebainbridge.com)

*Attorneys for David Ottensoser*

**JEFFREY C. DANIELS PC**

By: jeffrey daniels  
Jeffrey C. Daniels  
4 Carren Circle  
Huntington, NY 11743  
Telephone: (516) 745-5430  
Email: [jdaniels@jcdpc.com](mailto:jdaniels@jcdpc.com)

*Attorneys for Murray Huberfeld*

**PERKINS COIE LLP**

By: \_\_\_\_\_  
John Penn  
Jeffrey Vanacore  
30 Rockefeller Plaza, 22nd Floor  
New York, New York 10112  
Telephone: (212) 262-6900  
Email: [jpenn@perkinscoie.com](mailto:jpenn@perkinscoie.com)  
[jvanacore@perkinscoie.com](mailto:jvanacore@perkinscoie.com)

*Attorneys for GRD Estates Ltd.*

**LAW OFFICES OF KENNETH A.  
ZITTER**

By: \_\_\_\_\_  
Kenneth A. Zitter  
260 Madison Avenue  
New York, NY 10016  
Telephone: (212) 532-8000  
Email: [kzitter@aol.com](mailto:kzitter@aol.com)

*Attorneys for Estate of Jules Nordlicht,  
Barbara Nordlicht, FCBA Trust, Aaron  
Parnes, Sarah Parnes, Shmuel Fuchs  
Foundation, Solomon Werdiger, Morris Fuchs*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**MORRISON COHEN LLP**

By: \_\_\_\_\_  
Donald Chase  
Daniel Isaacs  
909 Third Avenue  
New York, NY 10022  
Telephone: (212) 735-8653  
Email: [dchase@morrisoncohen.com](mailto:dchase@morrisoncohen.com)  
[disaacs@morrisoncohen.com](mailto:disaacs@morrisoncohen.com)

*Attorneys for Huberfeld Family Foundation*

**BINDER & SCHWARTZ LLP**

By: \_\_\_\_\_  
Wendy H. Schwartz  
Gregory C. Pruden  
366 Madison Avenue, 6th Floor  
New York, NY 10017  
Telephone: (212) 510-7008  
Email: [wschwartz@binderschwartz.com](mailto:wschwartz@binderschwartz.com)  
[gpruden@binderschwartz.com](mailto:gpruden@binderschwartz.com)

*Attorneys for Daniel Saks*

**PIERCE BAINBRIDGE BECK PRICE &  
HECHT LLP**

By: \_\_\_\_\_  
Eric M. Creizman  
747 Third Avenue, Suite 200  
New York, NY 10017  
Telephone: (212) 972-0200  
Email: [ecreizman@piercebainbridge.com](mailto:ecreizman@piercebainbridge.com)


*Attorneys for David Ottensoser*

**JEFFREY C. DANIELS PC**

By: \_\_\_\_\_  
Jeffrey C. Daniels  
4 Carren Circle  
Huntington, NY 11743  
Telephone: (516) 745-5430  
Email: [jdaniels@jcdpc.com](mailto:jdaniels@jcdpc.com)

*Attorneys for Murray Huberfeld*

**PERKINS COIE LLP**

By:  \_\_\_\_\_  
John D. Penn  
Jeffrey D. Vanacore  
30 Rockefeller Plaza, 22nd Floor  
New York, New York 10112  
Telephone: (212) 262-6900  
Email: [jpenn@perkinscoie.com](mailto:jpenn@perkinscoie.com)  
[jvanacore@perkinscoie.com](mailto:jvanacore@perkinscoie.com)

*Attorneys for GRD Estates Ltd.*

**LAW OFFICES OF KENNETH A.  
ZITTER**

By: \_\_\_\_\_  
Kenneth A. Zitter  
260 Madison Avenue  
New York, NY 10016  
Telephone: (212) 532-8000  
Email: [kzitter@aol.com](mailto:kzitter@aol.com)

*Attorneys for Estate of Jules Nordlicht,  
Barbara Nordlicht, FCBA Trust, Aaron  
Parnes, Sarah Parnes, Shmuel Fuchs  
Foundation, Solomon Werdiger, Morris Fuchs*



[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**MORRISON COHEN LLP**

By: \_\_\_\_\_  
Donald Chase  
Daniel Isaacs  
909 Third Avenue  
New York, NY 10022  
Telephone: (212) 735-8653  
Email: [dchase@morrisoncohen.com](mailto:dchase@morrisoncohen.com)  
[disaacs@morrisoncohen.com](mailto:disaacs@morrisoncohen.com)

*Attorneys for Huberfeld Family Foundation*

**BINDER & SCHWARTZ LLP**

By: \_\_\_\_\_  
Wendy H. Schwartz  
Gregory C. Pruden  
366 Madison Avenue, 6th Floor  
New York, NY 10017  
Telephone: (212) 510-7008  
Email: [wschwartz@binderschwartz.com](mailto:wschwartz@binderschwartz.com)  
[gpruden@binderschwartz.com](mailto:gpruden@binderschwartz.com)

*Attorneys for Daniel Saks*

**PIERCE BAINBRIDGE BECK PRICE &  
HECHT LLP**

By: \_\_\_\_\_  
Eric M. Creizman  
747 Third Avenue, Suite 200  
New York, NY 10017  
Telephone: (212) 972-0200  
Email: [ecreizman@piercebainbridge.com](mailto:ecreizman@piercebainbridge.com)

*Attorneys for David Ottensoser*

**JEFFREY C. DANIELS PC**

By: \_\_\_\_\_  
Jeffrey C. Daniels  
4 Carren Circle  
Huntington, NY 11743  
Telephone: (516) 745-5430  
Email: [jdaniels@jcdpc.com](mailto:jdaniels@jcdpc.com)

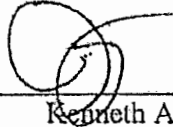
*Attorneys for Murray Huberfeld*

**PERKINS COIE LLP**

By: \_\_\_\_\_  
John Penn  
Jeffrey Vanacore  
30 Rockefeller Plaza, 22nd Floor  
New York, New York 10112  
Telephone: (212) 262-6900  
Email: [jpenn@perkinscoie.com](mailto:jpenn@perkinscoie.com)  
[jvanacore@perkinscoie.com](mailto:jvanacore@perkinscoie.com)

*Attorneys for GRD Estates Ltd.*


**LAW OFFICES OF KENNETH A.  
ZITTER**

By:  \_\_\_\_\_  
Kenneth A. Zitter  
260 Madison Avenue  
New York, NY 10016  
Telephone: (212) 532-8000  
Email: [kzitter@aol.com](mailto:kzitter@aol.com)

*Attorneys for Estate of Jules Nordlicht,  
Barbara Nordlicht, FCBA Trust, Aaron  
Parnes, Sarah Parnes, Shmuel Fuchs  
Foundation, Solomon Werdiger, Morris Fuchs*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By:   
Kim Steven Juhase  
200 Sheffield St., Suite 205  
Mountainside, NJ 07092  
Telephone: (908) 233-0045  
Email: [kimjuhase@cs.com](mailto:kimjuhase@cs.com)


*Attorney for Bernard Fuchs*

REGOSIN, EDWARD, STONE & FEDER

By: \_\_\_\_\_  
Saul Feder  
225 Broadway, Suite 613  
New York, New York 10007  
Telephone: (212) 619-1900  
Email: [sfeder@resflaw.com](mailto:sfeder@resflaw.com)

*Attorneys for Mark Nordlicht and Platinum  
Management (NY) LLC*

LAWRENCE R. GELBER

By:   
Lawrence R. Gelber  
34 Plaza Street East, Suite 1107  
Brooklyn, NY 11238  
Telephone: (718) 683-2383  
Email: [Gelberlaw@aol.com](mailto:Gelberlaw@aol.com)

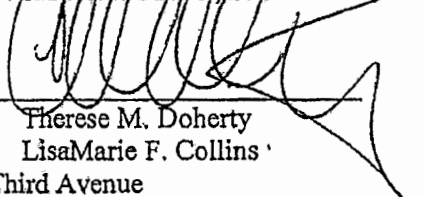
*Attorneys for Michael Nordlicht, Kevin  
Cassidy*

THOMPSON & KNIGHT LLP

By: \_\_\_\_\_  
Stuart Glick  
Nicole Williams  
Nicholas Davis  
Brittney Edwards  
900 Third Avenue, 20th Floor  
New York, NY 10022  
Telephone: (212) 751-3001  
Email: [Stuart.glick@tklaw.com](mailto:Stuart.glick@tklaw.com)  
[Nicole.williams@tklaw.com](mailto:Nicole.williams@tklaw.com)  
[Nick.davis@tklaw.com](mailto:Nick.davis@tklaw.com)  
[Brittney.edwards@tklaw.com](mailto:Brittney.edwards@tklaw.com)

*Attorneys for Michael Katz*

MINTZ LEVIN COHN FERRIS  
GLOVSKY & POPEO, P.C.

By:   
Therese M. Doherty  
LisaMarie F. Collins  
666 Third Avenue  
New York, NY 10017  
Telephone: (212) 935-3000  
Email: [LCollins@mintz.com](mailto:LCollins@mintz.com)  
[TMDoherty@mintz.com](mailto:TMDoherty@mintz.com)

*Attorneys for Michael Nordlicht, Kevin  
Cassidy and Meadows Capital LLC*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**NOVAK JUHASE & STERN**

By: \_\_\_\_\_

Kim Steven Juhase  
200 Sheffield St., Suite 205  
Mountainside, NJ 07092  
Telephone: (908) 233-0045  
Email: [kimjuhase@cs.com](mailto:kimjuhase@cs.com)

*Attorney for Bernard Fuchs*

**REGOSIN, EDWARD, STONE & FEDER**

By: \_\_\_\_\_

Saul Feder

225 Broadway, Suite 613  
New York, New York 10007  
Telephone: (212) 619-1900  
Email: [sfeder@resflaw.com](mailto:sfeder@resflaw.com)

*Attorneys for Mark Nordlicht and Platinum  
Management (NY) LLC*

**LAWRENCE R. GELBER**

By: \_\_\_\_\_

Lawrence R. Gelber  
34 Plaza Street East, Suite 1107  
Brooklyn, NY 11238  
Telephone: (718) 683-2383  
Email: [Gelberlaw@aol.com](mailto:Gelberlaw@aol.com)

**MINTZ LEVIN COHN FERRIS  
GLOVSKY & POPEO, P.C.**

Therese Doherty  
Lisamarie Collins  
666 Third Avenue  
New York, NY 10017  
Telephone: (212) 935-3000  
Email: [LCollins@mintz.com](mailto:LCollins@mintz.com)  
[TMDoherty@mintz.com](mailto:TMDoherty@mintz.com)

*Attorneys for Michael Nordlicht, Kevin  
Cassidy*

**THOMPSON & KNIGHT LLP**

By: \_\_\_\_\_

Stuart Glick

Nicholas Davis

Brittney Edwards

900 Third Avenue, 20th Floor  
New York, NY 10022

Telephone: (212) 751-3392

Email: [Stuart.glick@tklaw.com](mailto:Stuart.glick@tklaw.com)

[Nick.davis@tklaw.com](mailto:Nick.davis@tklaw.com)

[Brittney.edwards@tklaw.com](mailto:Brittney.edwards@tklaw.com)

*Attorneys for Michael Katz*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By: \_\_\_\_\_  
Kim Steven Juhase  
200 Sheffield St., Suite 205  
Mountainside, NJ 07092  
Telephone: (908) 233-0045  
Email: [kimjuhase@cs.com](mailto:kimjuhase@cs.com)

*Attorney for Bernard Fuchs*

REGOSIN, EDWARD, STONE & FEDER

By: \_\_\_\_\_  
Saul Feder  
225 Broadway, Suite 613  
New York, New York 10007  
Telephone: (212) 619-1900  
Email: [sfeder@resflaw.com](mailto:sfeder@resflaw.com)

*Attorneys for Mark Nordlicht and Platinum  
Management (NY) LLC*

LAWRENCE R. GELBER

By: \_\_\_\_\_  
Lawrence R. Gelber  
34 Plaza Street East, Suite 1107  
Brooklyn, NY 11238  
Telephone: (718) 683-2383  
Email: [Gelberlaw@aol.com](mailto:Gelberlaw@aol.com)

MINTZ LEVIN COHN FERRIS  
GLOVSKY & POPEO, P.C.

Therese Doherty  
Lisamarie Collins  
666 Third Avenue  
New York, NY 10017  
Telephone: (212) 935-3000  
Email: [LCollins@mintz.com](mailto:LCollins@mintz.com)  
[TMDoherty@mintz.com](mailto:TMDoherty@mintz.com)

*Attorneys for Michael Nordlicht, Kevin  
Cassidy*

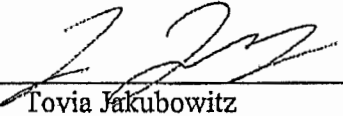
THOMPSON & KNIGHT LLP

By: \_\_\_\_\_  
  
Stuart Glick  
Nicholas Davis  
Brittney Edwards  
900 Third Avenue, 20th Floor  
New York, NY 10022  
Telephone: (212) 751-3392  
Email: [Stuart.glick@tklaw.com](mailto:Stuart.glick@tklaw.com)  
[Nick.davis@tklaw.com](mailto:Nick.davis@tklaw.com)  
[Brittney.edwards@tklaw.com](mailto:Brittney.edwards@tklaw.com)

*Attorneys for Michael Katz*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By:   
Tovia Jakubowitz  
3019 Avenue J  
Brooklyn, NY 1210  
Telephone: (347) 542-8529 347-230-6622  
Email: ~~tovia@jakubowitzchuang.com~~  
tovia@jclawllp.com  
*Attorneys for Rockwell Fulton Capital, L.P.,  
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: \_\_\_\_\_  
Eric R. Breslin  
Melissa S. Geller  
One Riverfront Plaza, Suite 1800  
Newark, NJ 07102  
Telephone: (973) 424-2000  
Email: [erbreslin@duanemorris.com](mailto:erbreslin@duanemorris.com)  
[msgeller@duanemorris.com](mailto:msgeller@duanemorris.com)  
*Attorneys for Estate of Uri Landesman*

WILSON, SONSINI, GOODRICH &  
ROSATI, PC

By: \_\_\_\_\_  
Eli Bard Richlin  
Jae Young Jeong  
Katherine Talbot McCarthy  
Michael S. Sommer  
Morris J. Fodeman  
1301 Avenue of The Americas, 40th Floor  
New York, NY 10019  
Telephone: (212) 447-7704  
Email: [erichlin@wsgr.com](mailto:erichlin@wsgr.com)  
[ajeong@wsgr.com](mailto:ajeong@wsgr.com)  
[kmccarthy@wsgr.com](mailto:kmccarthy@wsgr.com)  
[msommer@wsgr.com](mailto:msommer@wsgr.com)  
[mfodeman@wsgr.com](mailto:mfodeman@wsgr.com)  
*Attorneys for David Levy*

GIBSON, DUNN & CRUTCHER LLP

By: \_\_\_\_\_  
Chantale Fiebig  
Naima L. Farrell  
1050 Connecticut Ave NW  
Washington, DC 20036  
Telephone: (202) 955-8244  
Email: [cfiebig@gibsondunn.com](mailto:cfiebig@gibsondunn.com)  
[nfarrell@gibsondunn.com](mailto:nfarrell@gibsondunn.com)  
*Attorneys for Dhruv Narain*



[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: \_\_\_\_\_  
Tovia Jakubowitz  
3019 Avenue J  
Brooklyn, NY 1210  
Telephone: (347) 542-8529  
Email: [tovia@jakubowitzchuang.com](mailto:tovia@jakubowitzchuang.com)

*Attorneys for Rockwell Fulton Capital, L.P.  
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: Eric R. Breslin  
Eric R. Breslin  
Melissa S. Geller  
One Riverfront Plaza, Suite 1800  
Newark, NJ 07102  
Telephone: (973) 424-2000  
Email: [erbreslin@duanemorris.com](mailto:erbreslin@duanemorris.com)  
[msgeller@duanemorris.com](mailto:msgeller@duanemorris.com)

*Attorneys for Estate of Uri Landesman*

WILSON, SONSINI, GOODRICH &  
ROSATI, PC

By: \_\_\_\_\_  
Eli Bard Richlin  
Jae Young Jeong  
Katherine Talbot McCarthy  
Michael S. Sommer  
Morris J. Fodeman  
1301 Avenue of The Americas, 40th Floor  
New York, NY 10019  
Telephone: (212) 447-7704  
Email: [erichlin@wsgr.com](mailto:erichlin@wsgr.com)  
[ajeong@wsgr.com](mailto:ajeong@wsgr.com)  
[kmccarthy@wsgr.com](mailto:kmccarthy@wsgr.com)  
[msommer@wsgr.com](mailto:msommer@wsgr.com)  
[mfodeman@wsgr.com](mailto:mfodeman@wsgr.com)

*Attorneys for David Levy*

GIBSON, DUNN & CRUTCHER LLP

By: \_\_\_\_\_  
Chantale Fiebig  
Naima L. Farrell  
1050 Connecticut Ave NW  
Washington, DC 20036  
Telephone: (202) 955-8244  
Email: [cfiebig@gibsondunn.com](mailto:cfiebig@gibsondunn.com)  
[nfarrell@gibsondunn.com](mailto:nfarrell@gibsondunn.com)

*Attorneys for Dhruv Narain*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**JAKUBOWITZ & CHUANG LLP**

By: \_\_\_\_\_  
Tovia Jakubowitz  
3019 Avenue J  
Brooklyn, NY 1210  
Telephone: (347) 542-8529  
Email: [tovia@jakubowitzchuang.com](mailto:tovia@jakubowitzchuang.com)


*Attorneys for Rockwell Fulton Capital, L.P.  
Ditmas Park Capital, L.P.*

**DUANE MORRIS LLP**

By: \_\_\_\_\_  
Eric R. Breslin  
Melissa S. Geller  
One Riverfront Plaza, Suite 1800  
Newark, NJ 07102  
Telephone: (973) 424-2000  
Email: [erbreslin@duanemorris.com](mailto:erbreslin@duanemorris.com)  
[mngeller@duanemorris.com](mailto:mngeller@duanemorris.com)

*Attorneys for Estate of Uri Landesman*

**WILSON, SONSINI, GOODRICH &  
ROSATI, PC**

By:  \_\_\_\_\_  
Eli Bard Richlin  
Jae Young Jeong  
Katherine Talbot McCarthy  
Michael S. Sommer  
Morris J. Fodeman  
1301 Avenue of The Americas, 40th Floor  
New York, NY 10019  
Telephone: (212) 447-7704  
Email: [erichlin@wsgr.com](mailto:erichlin@wsgr.com)  
[ajeong@wsgr.com](mailto:ajeong@wsgr.com)  
[kmccarthy@wsgr.com](mailto:kmccarthy@wsgr.com)  
[msommer@wsgr.com](mailto:msommer@wsgr.com)  
[mfodeman@wsgr.com](mailto:mfodeman@wsgr.com)

*Attorneys for David Levy in the SHIP Action*

**GIBSON, DUNN & CRUTCHER LLP**

By: \_\_\_\_\_  
Chantale Fiebig  
Naima L. Farrell  
1050 Connecticut Ave NW  
Washington, DC 20036  
Telephone: (202) 955-8244  
Email: [cfiebig@gibsondunn.com](mailto:cfiebig@gibsondunn.com)  
[nfarrell@gibsondunn.com](mailto:nfarrell@gibsondunn.com)

*Attorneys for Dhruv Narain*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**JAKUBOWITZ & CHUANG LLP**

By: \_\_\_\_\_  
Tovia Jakubowitz  
3019 Avenue J  
Brooklyn, NY 1210  
Telephone: (347) 542-8529  
Email: [tovia@jakubowitzchuang.com](mailto:tovia@jakubowitzchuang.com)

*Attorneys for Rockwell Fulton Capital, L.P.  
Ditmas Park Capital, L.P.*

**DUANE MORRIS LLP**

By: \_\_\_\_\_  
Eric R. Breslin  
Melissa S. Geller  
One Riverfront Plaza, Suite 1800  
Newark, NJ 07102  
Telephone: (973) 424-2000  
Email: [erbreslin@duanemorris.com](mailto:erbreslin@duanemorris.com)  
[msgeller@duanemorris.com](mailto:msgeller@duanemorris.com)


*Attorneys for Estate of Uri Landesman*

**WILSON, SONSINI, GOODRICH &  
ROSATI, PC**

By: \_\_\_\_\_  
Eli Bard Richlin  
Jae Young Jeong  
Katherine Talbot McCarthy  
Michael S. Sommer  
Morris J. Fodeman  
1301 Avenue of The Americas, 40th Floor  
New York, NY 10019  
Telephone: (212) 447-7704  
Email: [erichlin@wsgr.com](mailto:erichlin@wsgr.com)  
[ajeong@wsgr.com](mailto:ajeong@wsgr.com)  
[kmccarthy@wsgr.com](mailto:kmccarthy@wsgr.com)  
[msommer@wsgr.com](mailto:msommer@wsgr.com)  
[mfodeman@wsgr.com](mailto:mfodeman@wsgr.com)

*Attorneys for David Levy*


**GIBSON, DUNN & CRUTCHER LLP**

By:  \_\_\_\_\_  
Chantale Fiebig  
Naima L. Farrell  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036  
Telephone: (202) 955-8244  
Email: [cfiebig@gibsondunn.com](mailto:cfiebig@gibsondunn.com)  
[nfarrell@gibsondunn.com](mailto:nfarrell@gibsondunn.com)

*Attorneys for Dhruv Narain in the SHIP Action*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**KLESTADT WINTERS JURELLER,  
SOUTHARD & STEVENS, LLP**

By:   
John E. Jureller, Jr.  
200 West 41st Street, 17th Floor  
New York, NY 10036  
Telephone: (212) 972-3000  
Email: [jjureller@klestadt.com](mailto:jjureller@klestadt.com)

*Attorneys for Defendant Beechwood Re (In  
Official Liquidation) in the SHIP Action*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

KLESTADT, WINTERS, JURELLER,  
SOUTHARD & STEVENS LLP

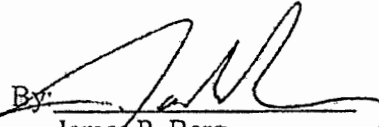
By: \_\_\_\_\_

John Evans Jureller  
200 West 41st Street, 17th Floor  
New York, NY 10018  
Telephone: (212) 972-3000  
Email: [jjureller@klestadt.com](mailto:jjureller@klestadt.com)

*Attorneys for Defendant Beechwood Re Ltd.*

PARKER IBRAHIM & BERG LLP

By: \_\_\_\_\_

  
James P. Berg  
Daniel A. Schleifstein  
Sanjay P. Ibrahim  
5 Penn Plaza, Suite 2371  
New York, New York 10001  
Telephone: (212) 596-7037  
Facsimile: (908) 333-6230  
Email: [james.berg@piblaw.com](mailto:james.berg@piblaw.com)  
[daniel.schleifstein@piblaw.com](mailto:daniel.schleifstein@piblaw.com)  
[sanjay.ibrahim@piblaw.com](mailto:sanjay.ibrahim@piblaw.com)

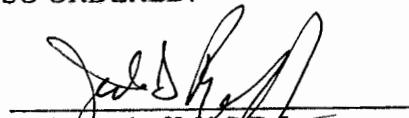
*Please respond to Somerset office:*

270 Davidson Avenue  
Somerset, New Jersey 08873  
Telephone: (908) 725-9700  
Facsimile: (908) 333-6230

*Attorneys for Defendants BRE BCLIC  
Primary, BRE BCLIC Sub, BRE WNIC 2013  
LTC Primary and BRE WNIC 2013 LTC Sub*

Dated: New York, New York  
March 26, 2019

SO ORDERED:

  
Jed S. Rakoff, U.S.D.J.



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IN RE PLATINUM BEECHWOOD LITIGATION,

: No. 1:18-cv-06658-JSR

:  
: **Non-Disclosure Agreement**  
:-----X

SENIOR HEALTH INSURANCE COMPANY OF  
PENNSYLVANIA,

: No. 1:18-cv-06658-JSR

Plaintiff,

-v-

BEECHWOOD RE LTD., et al.,

Defendants.  
:-----X

MARTIN TROTT and CHRISTOPHER SMITH, as  
Joint Official Liquidators and Foreign Representatives  
of PLATINUM PARTNERS VALUE ARBITRAGE  
FUND L.P. (in Official Liquidation) and PLATINUM  
PARTNERS VALUE ARBITRAGE FUND L.P.  
(in Official Liquidation),

: No. 1:18-cv-10936-JSR

Plaintiffs,

-v-

PLATINUM MANAGEMENT (NY) LLC, et al.,

Defendants.  
:-----X

MELANIE L. CYGANOWSKI, as Equity Receiver for  
PLATINUM PARTNERS CREDIT OPPORTUNITIES  
MASTER FUND LP, PLATINUM PARTNERS CREDIT  
OPPORTUNITIES FUND (TE) LLC, PLATINUM  
PARTNERS CREDIT OPPORTUNITIES FUND LLC,  
PLATINUM PARTNERS CREDIT OPPORTUNITIES

: No. 1:18-cv-12018-JSR

